

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARMEN MEDINA-SERRANO

Defendant.

INDICTMENT

CRIMINAL NO. 17- 435 (JAG)

CRIMINAL VIOLATION:
18 U.S.C. § 641

INDICTMENT

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

1. The United States Department of Veterans Affairs (hereinafter "VA") was a cabinet level department of the Federal government whose mission was to care for United States military veterans and their dependents. In furtherance of this mission, VA ran the largest hospital system in the United States.
2. In San Juan, Puerto Rico, the VA Medical Center (hereinafter "VAMC") was owned and operated by VA utilizing federal funds.
3. The VAMC included an in-patient and out-patient pharmacy which provided prescription medications to qualified health plan beneficiaries, including veterans of the United States military.

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4. From in or about October 2012 to in or about July 2016, Defendant **CARMEN MEDINA-SERRANO** was an out-patient pharmacy procurement technician for the VAMC San Juan Out-Patient Pharmacy.
5. As a pharmacy procurement technician, Defendant **CARMEN MEDINA-SERRANO** had access to the electronic system for ordering prescription medications, placed orders for prescription medications, and stocked the out-patient pharmacy with medications, including Insulin Lispro 100, Insulin Lispro 75/25, and Insulin Lantus Glargine.
6. Insulin Lispro 100, Insulin Lispro 75/25, and Insulin Lantus Glargine were prescription drugs regulated by the Federal Drug Administration (hereinafter "FDA") and used to treat individuals with medical conditions, including diabetes.
7. Prescription medications in the possession and custody of the VAMC San Juan Out-Patient Pharmacy were property of the United States government.

COUNT ONE
(Theft of Government Property)
18 U.S.C. §§ 641

8. Paragraphs 1-7 are re-alleged as if set forth fully herein.
9. From in or about October 2012, up to and including in or about July 2016, in the District of Puerto Rico and within the jurisdiction of this Court,

CARMEN MEDINA-SERRANO

the defendant herein, willfully and knowingly did steal, purloin, and convert to the use of another a thing of value of the United States in an amount over \$1,000, that is prescription medications belonging to the VAMC Out-Patient Pharmacy in San Juan, Puerto Rico.

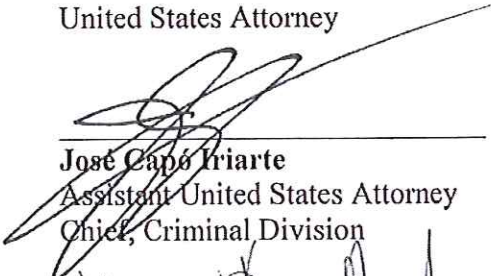
10. All in violation of Title 18, United States Code, Section 641.

TRUE BILL

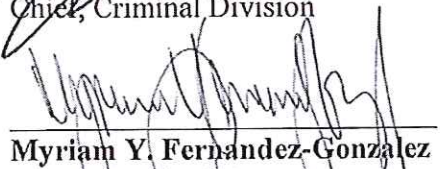
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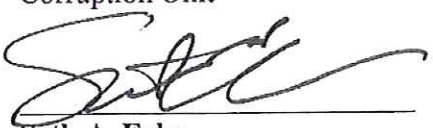
ROSA EMILIA RODRÍGUEZ-VÉLEZ
United States Attorney



José Capó Triarte
Assistant United States Attorney
Chief, Criminal Division



Myriam Y. Fernandez-Gonzalez
Assistant United States Attorney
Deputy Chief, Financial Fraud &
Corruption Unit



Seth A. Erbe
Assistant United States Attorney